

IN THE UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH CIRCUIT

PENGUIN RANDOM HOUSE  
LLC, *et al.*,

Plaintiffs–Appellees,

v.

JOHN ROBBINS in his official  
capacity as President of the Iowa  
State Board of Educations, *et al.*,

Defendants–Appellants.

Case No. 24-1082

APPELLANTS’ DESIGNATION  
& STATEMENT OF ISSUES

John Robbins, McKenzie Snow, and Chad Janzen (“State Defendants”), submit the following designation and statement of issues under the Federal Rules of Appellate Procedure. This appeal follows from Case No. 4:23-cv-00474-SHL-SBJ (S.D. Iowa). The designation from companion case *Iowa Safe Schools v. Reynolds*, No. 24-1075, 4:23-cv-00474-SHL-SBJ (S.D. Iowa), is also included.

**I. Designation.**

Defendants and Plaintiffs have conferred and agreed to the following joint designation of the record for the appendix, under Eighth Circuit Rule 30A:

*Iowa Safe Schools v. Reynolds*

- Complaint (Dkt. 1)
- Motion for Preliminary Injunction (Dkt. 2) and attached exhibits
- State Defendants’ Resistance to Motion for Preliminary Injunction (Dkt. 53) and attached affidavits

- Plaintiffs' Reply Brief to State Defendants' Resistance (Dkt. 59)
- Transcript of Proceedings (Dkt. 62)
- Order on Motion for Preliminary Injunction (Dkt. 65)

*Penguin Random House v. Robbins*

- Complaint (Dkt. 1) and attached exhibits
- Motion for Preliminary Injunction (Dkt. 28)
- Brief in Support of Plaintiffs' Motion for Preliminary Injunction (Dkt. 34) and attached exhibits
- School District Defendants' Response to the Motion For Preliminary Injunction (Dkt. 40)
- State Defendants' Resistance to Motion for Preliminary Injunction (Dkt. 45) and attached affidavits
- Plaintiffs' Reply Brief to State Defendants' Resistance (Dkt. 53)
- Transcript of Proceedings (Dkt. 55)
- Order on Motion for Preliminary Injunction (Dkt. 56)

**II. Statement of Issues.**

Defendants intend to present the following issues on appeal:

1. Whether the district court abused its discretion or otherwise erred when it imposed a preliminary injunction against Iowa Senate File 496.

Respectfully submitted,

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/s/ Eric Wessan  
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